

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

-----X

HUDA FAKHREDDINE,
TROUTT POWELL, and PENN
FACULTY FOR JUSTICE IN PALESTINE,

Plaintiffs,

No. 2:24-cv-01034 (MSG)

-against-

THE UNIVERSITY OF PENNSYLVANIA,

Defendants,

-----X

DECLARATION OF HUDA FAKHREDDINE

I, Huda Fakhreddine declare as follows:

- 1.** I am Associate Professor of Arabic Literature at the University of Pennsylvania (“UPenn”). My work focuses on modernist movements or trends in Arabic poetry and their relationship to the Arabic literary tradition.
- 2.** Please bear with me as I describe to this Court the history of bigotry, censorship and threats I have had to deal with at U Penn. This is the context and background against which the Court can understand how the University's decision voluntarily to release documents against me to the House Committee on Education and the Workforce has harmed me.
- 3.** In my capacity as the 2023-2024 [topic director](#) of the Wolf Humanities Center at the university, I helped organize The Palestine Writes Literature Festival

(September 22-23, 2024) at UPenn, the first event in a yearlong [calendar of public programming](#).

- 4.** Almost immediately, and continuing to the present, I have been subjected to vicious attacks and accusations from within the university and without, and to a relentless online doxing campaign. Some of the aggressions have been documented by [AAUP](#), [MESA](#), and [A4E](#).
- 5.** In August 2023, the university started getting threatening letters from interest group and donors, misrepresenting the festival and vowing to withdraw their funding if the university didn't cancel it.
- 6.** The attacks continued after the festival and only became more rabid and vicious after the aggressions in Gaza, especially after my partner and I along with a group of Penn faculty organized two walkouts in protest of the genocide. We were targeted with hate mail, threats, and online campaigns to fire us, deport us, and more.
- 7.** On Oct. 23 a petition started circulating on change.org asking for the firing of three Penn professors among them my partner and me. It was based on decontextualized misinformation and defamation and included some falsely attributed quotes. The petition accused the three professors of antisemitism, conflating criticism of Israel with antisemitism. This petition has since been taken down “for review” after we, the three professors, registered complaints with the website and due to pressure from academics from across the country who signed this petition in our support:

<https://docs.google.com/forms/d/e/1FAIpQLScMB6Ed9pL8iBcW0GYsP6zaHLVHcEKXal2nuQsr0L7FBQy6kw/viewform>

8. It added insult to injury when the House Committee, like a shark sensing blood in the water, intervened in December 2023. My partner and I were mentioned by name at the congressional hearing by two Republican congressmen in their interrogation of the former Penn president, Liz Magill. These politicians, in full emulation of the McCarthy era, accused me of being an antisemite and demanded I be fired from Upenn-- without ever having spoken to me or anyone, apparently, who could explain the profound, Constitutional distinction between criticism of Israel and antisemitism.

9. This is one segment:

WhatsApp Video 2024-01-08 at 11.51.16 AM.mp4

This is another.

<https://www.youtube.com/watch?app=desktop&v=ZbbTj9BKF>

10. The congressmen's claims are lies and misrepresentations. When my class, "Resistance Literature from Pre-Islamic Arabia to Palestine" was mentioned, I hadn't even finished writing a syllabus. I had a flyer with a short description and some sample readings, all of which are major works by established poets and writing from the Arabic tradition ranging from pre-Islamic times to the present. The accusations that my syllabus is antisemitic and hateful are a recycling of Israeli propaganda and are themselves racist and antisemitic.

Attacks on Campus and in the Department

11. The threats and hate my partner and I have been receiving, by mail, on email, and on social media, greatly intensified after U Penn voluntarily gave the House Committee documents against me, aiding them in their campaign of vilification. My partner was advised to stay off campus and given an exceptional leave from teaching in fall 2023 because he was being doxed online and on Zionist platforms through information and recordings provided by Penn students, as is the case here: <https://blogs.timesofisrael.com/upenn-palestine-rally-what-the-editorials-wont-post/>

12. I was isolated from my department. Sponsorship of events I had organized previously with the department's support was withdrawn. One such event was a conversation about prison writing between one of our Arabic lecturers and a well-known Egyptian writer who writes in English. A perfectly legitimate topic. Both speakers shared a prison cell in Egypt after the 2011 revolution, making it a great fit for the revolution forum at Wolf as well. Our chair, a historian of modern Egypt who should have been the first to welcome an event like this, canceled the department's co-sponsorship of the event without consulting me. She had received complaints through the dean's office from the Nursing School where the room for the event was reserved. Her decision to cancel the NELC sponsorship is a violation of academic freedom and is completely unjustified.

13. A couple of weeks before that, the chair deleted a message that I sent to the NELC faculty listserv in which I shared a new of the publication of a new poem and a new book, something she herself keeps encouraging department members to do. My message was rejected, and I was informed of a new policy

restricting the use of the department listserv. This policy was not shared with the NELC faculty at large prior. It was an ad hoc measure targeting my message and my activity in the department and counts as a clear case of discrimination.

14. Since Spring 2024, after the intervention of the House Committee and its public and highly false McCarthesque vilification of me, my classes have been held in unlisted location due to security concerns. All my contact information has been removed from the Penn webpages to limit the volume of hate mail. Due to that, enrolment in my classes has been low and my communications in the university and in my field at large has been considerably limited.

15. Most recently, my department is delaying my request to go up for promotion. Last September, the chair of our department convened a meeting to encourage me along with two other associate professors in department to prepare for promotion to full professor. The department then was preparing for the outside review and anticipating that a recommendation that more of us are promoted, if qualified, to address the plateauing that some academics find themselves in mid-career but more importantly to create more diversity and equity among full professors. After the backlash from Palestine Writes and the heightened pressures after Oct. 7, she abandoned the idea and at some point, later in the year, stopped responding to my emails and started avoiding me all together. This semester I requested that I be put up for promotion from the new chair, who was enthusiastic and supportive at first, but is now hesitant after consulting with the rest of the department. The concerns raised are unconvincing and reveal discriminating and an exceptional treatment of my case. Delaying promotion is not only an

interference in the trajectory of my career and a wrongful assessment of my work, but also denying me a considerable salary raise.

16. During the 2023-2024 academic year, I was the topic director of the forum on Revolution at the Wolf Humanities Center. In addition to the backlash that followed the Palestine Literature Festival, the Center continued to censor me for the remainder of the year, due to pressure from the Center's main donor, Dick Wolf. A major part of my role as topic director is to plan a calendar of public events. It was my job to introduce many of the events which were then recorded and posted on the Center's youtube channel. In February I noticed that my introductions were cut out of the video posted on youtube. When I inquired, I was told that this was done to protect me and the center from outside attacks. I objected and insisted that the recordings be uploaded without editing or that all the videos be taken down until the time is right for them to be posted without altering.

17. Donor pressure was very palpable during the entirety of my term as topic director of the Wolf Center. The most blatant example of donor intimidation and pressure was the January episode of Law and Order. Dick Wolf, the benefactor of the Wolf Humanities Center, is also the producer of the show. In January, one of the fellows in the seminar on revolution asked if I had seen the latest episode of the show which was about me. I had never seen the show before, but I was horrified that a viewer could easily identify the episode as about me and the incidents that had taken place at Penn earlier that year. <https://www.nbc.com/law-and-order/video/freedom-of-expression/9000334401>

18. The episode is titled “Freedom of Expression.” It is set in a fictional university that resembles Penn very closely. In some scenes of the episode recreate particularly locations on the Penn campus where pro-Palestinian action took place. Briefly, the episode tells the story of an Arab professor, who has some features resembling mine (long dark hair, an accent, and is always seen wearing a Palestinian Kaffiyya), organizes a Palestinian media festival on campus which leads to tensions on campus. The climax of the episode is when the Arab professor influences an American pro-Palestinian student to murder the Jewish president of the university. The trial of the student as defendant and the professor as witness takes up the remainder of the episode. The episode depicts Arabs and pro-Palestinian students and faculty in the most racist manner. The episode is absurd, chilling, and extremely irresponsible. It is shown that the University of Pennsylvania is run by the special interests and ideologies of its corrupt donors.

Loss of outside opportunity

19. I was nominated a [Friedrich Wilhelm Bessel Research Award](#) by a prominent leading scholar in the field of Arabic studies in Germany and the world. The process began in Oct. 2022 and included several levels of reviews and checks. In Spring 2023, I learned that my nomination, which had reached the last stages of review, was rejected by the AvH (Alexander Von Humboldt-Stiftung).

20. The nominator/applicant prepared an extensive and thorough nomination file and submitted it in October 2022. The AvH committee sends all nominations for external review, a process which usually takes months. The nominator/applicant was informed that discussion of my nomination was

postponed from Oct. 2023 to March 2024. Nominees for this award often don't even know that they are nominated. The AvH has the right to grant or deny this award at their discretion as long as they hold themselves to their own processes (as detailed on their website) and their declared mission and the principles of academic freedom and "scientific ethics" which they claim to value. I am not surprised by their decision but amazed at how terribly they mismanaged this case, exposing their bias and unprofessionalism.

21. My nominator was asked by the AvH to exceptionally contact me on two occasions during the process: once in early March, 2024 prior to the committee's final meeting on March 15, 2024, and once in early April to inform me that my nomination was rejected.

22. On March 7th, the nominator contacted me to ask me as a set of questions on behalf of the award committee upon which they were required to submit a report to the committee prior to its March 15 meeting. This means that my nomination, up to that point, one week before the meeting in which the decision was made, had passed all the peer reviews, met all the requirements, and was still under consideration. In a phone call with the nominator on March 7th, I was asked to comment on my position on Hamas and the BDS (Boycott Divestment and Sanctions) movement. I was also asked to comment on two retweets/reposts I made in November and December 2023: one was a reposting of a statement by Birzeit University, and another was a reposting of a petition prepared by US academics and scholars, both condemning the genocide in Gaza and calling for Israel to be held accountable for its crimes. Finally, I was asked to explain what I

would do if I were in an academic setting in which Israeli students and scholars are present. All ridiculous questions, completely unrelated to the assessment of my work as a scholar of Arabic literature. They also reveal the committee's ignorance of my political positions which it claims to be investigating and of the fact that I teach at the University of Pennsylvania where I interact with Israeli colleagues and students all the time.

23. In their flailing and unprincipled attempts at self-preservation, the AvH abandoned their own processes by charging my nominator with interrogating my political positions through a set of ignorant and humiliating questions. The AvH exposed, at least in this case, their lack of political and intellectual integrity and their disregard for academic freedom as a guiding principle.

24. The AvH not only disregarded my academic record and denied me an objective, unbiased assessment, but they also disrespected the expert assessment, the careful and thoughtful presentation offered to them by my nominator. AvH relied on google searches and social media frenzy, sacrificing their intellectual and academic integrity in favor of the misinformation, slander, and doxxing peddled by the Zionist propaganda machine. Sadly, this is the fall of yet another respected academic institution which has subscribed to the false and preposterous conflation of Zionism and Judaism, conflating criticism of Israel with antisemitism, allowing a genocidal state to take advantage of German guilt and weaponize the memory of the holocaust, all while an active undeniable genocide continues to unfold before our eyes.

Personal and Family Damages

25. This year of attacks, isolation, and defamation has had a heavy toll on my family. We installed a security system in our home in West Philadelphia and were in close contact with Penn Police last fall and spring for fear of an incidents off campus and close to our home. We have incurred thousands of dollars in medical and mental health bills. We all suffer from anxiety and insomnia, including my 12-year-old daughter who has had to deal with the backlash of the situation at school and the consequence of them at home. My partner is especially vulnerable and has suffered several health emergencies in the past months due to the pressures and the anxiety- inducing work environment. Both my partner and I do not feel safe on campus and have avoided using our offices to do our work.

26. On July 27, 2024, I received a violent threatening letter in my mailbox on campus. It was sent from a fake address but postmarked in Buffalo NY. I reported it to the Penn admin and public safety and infoermed them that I hold the university responsible for any harm I might be subject to as a consequence of this, as well as the anxiety and distress that now come with merely being on campus.

27. This is one example of many other forms of horrifying intimidation and harassment, which have made the university a highly unsafe environment for me.

28. On August 21, 2024, I learned through my lawyer, Mr. Wallace, that UPenn counselk had written a letter filed with this Court, staing that the House Committee had again written to him, this time containing defamatory statements about therrre named Upenn professors-- my partner and me, and a third individual. This had a further extremely chilling, disturbing and traumatic effect. I felt even more targeted than I did over the course of the previous year. In its response to

this letter, Penn confirmed its willingness to share syllabi, CV, and email communications, i.e. all my information which the university owns, or to which is has access. Penn's general counsel even reached out to me and my partner asking if we would voluntarily cooperate and provide any other relevant material, including personal emails and private files. Of course, we refused. This is not only a violation of privacy and academic freedom, but also a deeply disturbing intimidation tactic whose purpose is to curtail our ability to speak freely and teach freely and aims ultimately to silence us.

29. A Google search on "totalitarian definition" brings up the Oxford English Dictionary: "relating to a system of government that is centralized and dictatorial and requires complete subservience to the state". I am stunned by the House Committee's total attention to my private affairs and beliefs, and its attempt to crush me, to get me not only fired by UPenn but effectively excluded from the America of which I am a citizen, solely because I hold beliefs the Committee dislikes.

30. Under these circumstances, how could U Penn, which in its faculty manual and elsewhere, brags of its commitments to academic freedom and free speech, violate its commitments to those principles and to me, by voluntarily providing documents about me to the House Committee?

31. Around the time UPenn asked me to produce personal emails and files to the McCarthy-esque House Committee, its counsel also sent me a "hold" or "nonspoliation" letter, directing me not to delete or modify any of my non-university communications or files. This means my email is not private and is not

safe to use. This is not only surveillance of what I write in emails, it also violates the privacy of all those who communicate with me including my students which makes it a FERPA violation as well. The chilling effect is again immense; I feel I can no longer safely communicate with students, in either university email or privately, without all my missives and words being under a totalitarian magnifying glass.

32. These hold letters, and the use of my name in communications between the congressional committee and the university, as well as the many waves of doxing online, have discouraged many Penn colleagues and former friends from associating with me and with my students. This has led to an extremely isolating atmosphere and to my exclusion from academic opportunities and gatherings.

33. The reputational damage is irreparable. I hold the university responsible for this damage because the most vicious attacks were launched by Penn students who are active on social media and connected to influence groups and platforms. One of these students in particular has been targeting me in posts on X that get thousands of views and reactions. He used to tag me before I blocked him. When he was still a Penn student, I reported his behavior to the university as a violation of community standards and student code of conduct. I got no response until after the end of the spring semester, after the student had graduated. This is an excerpt of the message I received on May 22, 2024: “We are getting through all of our referrals from the weekend and I just read through your report. I am sorry that this has been your experience with this student. Unfortunately, my understanding is that the student just graduated and, therefore, we have passed the deadline for

opening cases against graduating students (it is typically noon the Friday before graduation for prior behavioral complaints)’’.

34. The threats to my personal safety and the damage to my professional reputation were enabled by the university’s passive response to my many complaints and its voluntary cooperation with the House Committee.

35. The defamatory assertions about me and the continuous misrepresentation of my work have a damaging effect on my students as well, especially graduate students, some of who are currently on the market seeking employment at other universities or research institution. Penn’s failure to protect me and its other faculty members is also a failure to protect its own students.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 18, 2024

/s/ Huda Fakhreddine

Huda Fakhreddine